

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Andrew L. Dudzek,
Jennifer L. Dudzek,

Debtors.

Case No. 22-12581-amc

Chapter 13

Objection to ECF No. 58

Debtors' Objection to Motion to Dismiss

Debtors Andrew L. Dudzek and Jennifer L. Dudzek, by their attorney, hereby object to the Motion to Dismiss filed by chapter 13 standing Trustee Scott F. Waterman. The Court must deny the Motion for the following reasons:

1. The Debtors have proposed a modified chapter 13 plan that cures the grounds for relief stated in the Trustee's motion.

The Court must grant relief in the form of order attached, and further in the Debtors' favor if necessary and proper under the law. If this case is dismissed notwithstanding the Debtors' objection, the Debtors request that the Court retain jurisdiction over plan payments consistent with *In re Sherman*.

Date: April 22, 2024

CIBIK LAW, P.C.

Attorney for Debtors

By: 

Michael I. Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com

Certificate of Service

I certify under penalty of perjury that on this date I caused this document to be served on all parties on the Clerk's Service List by electronic means through the CM/ECF system.

Date: April 22, 2024



Michael I. Assad